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September 23, 2011
TRC Solutions Project No. 182978

Mr. Gary Moore
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

**Re: Weekly Progress Report
Falcon Refinery Superfund Site
Ingleside, San Patricio County, Texas
TXD 086 278 058**

Dear Mr. Moore:

On behalf of the National Oil Recovery Corporation (NORCO), TRC Solutions (TRC) submits this Weekly Progress Report on the Removal Action Activities at the Falcon Refinery Federal Superfund Site to the United States Environmental Protection Agency for your review.

If you have any questions, comments, or concerns, please do not hesitate to contact me at (512) 699-9931.

Sincerely,
TRC

Alonzo G. Arredondo
Senior Geologist

Attachment: Weekly Progress Report
cc: National Oil Recovery Corporation



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WEEKLY PROGRESS REPORT - Falcon Refinery Federal Superfund Site, Ingleside, TX;

1. COMPLETED PROJECT ACTIVITIES TO DATE

The project activities completed to date are listed below.

A. Removal of Sludge and Demolition of Tanks

Tanks completed to date are all located in the Area of Concern 1N (AOC 1N) which is in the NW portion of the Falcon Refinery. AOC 1N is located on the property which lies north-west of the intersection of FM 2725 and Bishop Road in Ingleside, TX.

The activities completed for tanks listed below include the removal and transfer of tank bottoms into Tank 26, decontamination, demolition and the removal/transportation of the tanks from the Falcon Refinery to Commercial Metals (CMC recycling) in Corpus Christi, TX:

- Tank 2
- X1
- X2
- X3

B. Sampling and Waste Characterization

Preliminary sampling on Tanks 17, 18, 19, 20, 21, 22, 23, & 24 for the purpose of characterizing waste was conducted on September 9, 2011. Additional sampling for characterizing waste was conducted on September 22, 2011. Sampling results are expected to be received by the latter part of next week -September 26 to 30, 2011.

2. PROJECT ACTIVITIES TO BE COMPLETED - (*Projected Schedule/ Established Deadlines to be developed*)

A. Demolition / Relocation of Structures

We plan to relocate or demolish a small building that lies adjacent to the road which provides limited access to Tanks 17 – 24. The structure as it is currently located impedes access between the refinery roads and the tanks. Current access to the tanks is restricted to a narrow space between several risers and a live transformer and will not accommodate the 18 wheeler that will be used to load and transport the demolished



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tanks to the recycling facility. Also limiting access to Tanks 17-24 is a grey power panel and live transformer that is situated next to the road. A conduit that carries 440 volts is located south of the road and presents high risk for electrocution & fire if the conduit is damaged. We have decided that we will not load metal over the conduit and into an 18 wheeler toward the south field. The safe alternative is to try to move or demolish the building so the 18 wheeler can access the tanks to the east. The building is scheduled to be moved or demolished next week to facilitate access on September 26 - 30, 2011.

B. Removal of Tank Tops

The following tanks are scheduled for the partial removal of the tops. The removal of tops will enable work to proceed within each tank as it will remain intact with approximately 4 to 5 feet of sidewall and floor; Mobilization of the shear and trailer to remove the tops will occur in the middle of next week - September 26 to 30, 2011.

- Tank 17
- Tank 18
- Tank 19
- Tank 20
- Tank 21
- Tank 22
- Tank 23
- Tank 24

C. Removal and Transfer of sludge to Tank 26

- Tank 27 sludge removal: This activity is currently in progress.
- Tank 10 sludge removal: Activities will resume late next week or as a vacuum truck is acquired.
- Tank 17, 21, 23 & 24 sludge removal / demolition: Activities will commence late next week.
- Tank N1 sludge removal / demolition: Currently under evaluation;
- Tank N2 sludge removal / demolition: Currently under evaluation;
- Tank Y1 sludge removal / demolition: Currently under evaluation;
- Tank 30 sludge removal: no activity at this time;



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- Tank 7 sludge removal: no activity at this time.

D. Treatment of Water in Tank 26

We are currently waiting for a formal response from the TCEQ on their review of a waste water discharge permit that has been submitted on behalf of the Falcon Refinery. We have discovered through preliminary discussions with the TCEQ that the request for a permit has been denied by the Waste Water Program at TCEQ based on a scenario that groundwater is shallow (0 - 0.5 feet of depth) and there is an insufficient soil horizon to prevent the treated wastewater from reaching the groundwater. We will evaluate the depth to groundwater at the site to provide a demonstration to the TCEQ in support of granting approval of the waste water permit for the treatment and discharge of water in Tank 26.

3. COMPLETED PROJECT ACTIVITIES FOR WEEK OF SEPTEMBER 19-23, 2011

A. Removal of Tank Bottoms

The removal of tank bottoms from refinery Tanks and the transfer of that material into Tank 26 was completed this week for the tanks that are listed below:

- Tank X1
- Tank X2
- Tank X3

The completed tank removals were all located in AOC 1N.

B. Demolition and Recycling

The demolition and recycling of the tanks listed below was also completed this week. The tanks were sheared, loaded into an 18 wheeler at the Falcon Refinery and transported to a recycling facility on Agnes Street in Corpus Christi, TX (Commercial Metals - CMC recycling).

- Tank X1
- Tank X2
- Tank X3



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C. Removal and Transfer of sludge to Tank 26

- Tank 27: 4 loads (280 bbls) of sludge and wash water were transferred to Tank 26;
- Tanks X1, X2 & X3: 2.5 loads (175 bbls) of tank sludge and wash water were transferred to Tank 26;

D. Sampling and Waste Characterization

Preliminary sampling on Tanks 17, 18, 19, 20, 21, 22, 23, & 24 for the purpose of characterizing waste was conducted on September 9, 2011. Additional sampling for characterizing waste was conducted on September 22, 2011. Sampling results are expected to be received by the latter part of next week - September 26 to 30, 2011. A decision for the disposal destination will be made based on the results.

4. ACTIVITIES PLANNED FOR NEXT WEEK - SEPTEMBER 26-30, 2011

A. Sludge Removal

- Tank 27 - Continue sludge removal/transfer to Tank 26; Begin decontamination of tank;
- Tank 10 – Resume sludge removal/transfer to Tank 26;

B. Removal of Tank Tops & Sludge Removal

- Begin removal of liquids from Tank 17, 20, 21, 23 & 24;
- Remove and dispose of solids from Tanks 18, 19 & 22;

C. Disposal of Sludge, Metal and Sediment

The material that includes metal and dry sediment as well as K169 listed waste that is below the universal treatment standards will be transported to and disposed at U.S. Ecology.

The liquid that exceeds the treatment standards will be transferred into Tank 26.

The waste solids and the caustic material in Tank 20 will be sent to U.S. Ecology for thermal desorption and treatment.



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5. ISSUES ENCOUNTERED

- Tank 27 - Residual sludge is more difficult to remove and requires more time to transfer due to the significant amounts of rust and debris in the material; As the higher viscosity material is encountered, the rate of sludge that is removed and transferred into Tank 26 becomes less than optimal (3 loads removed and transferred per day).
- Tank 10 - We are planning to resume the removal and transfer sludge with a second vacuum truck to continue the removal and minimize delays.
- Treatment of Water - We continue to evaluate the groundwater conditions at the site and plan to provide a demonstration to the TCEQ in support of granting approval of the waste water permit for the treatment and discharge of water in Tank 26.
- Remaining Activities - Based on the current rate of progress, and the work that remains (especially removing sludge from Tanks 10, 30 and 7) to be performed to meet the October 28, 2011 deadline and complete the site removal action activities, additional resources (crews and vacuum trucks) are needed to accelerate and complete the removal of sludge and demolition of tanks within EPA's required schedule.